

DECLARATION OF VICTORIA BLAKEBOROUGH
ATTORNEY FOR A.A.R.P.

I, Victoria Blakeborough, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct to the best of my knowledge and belief:

1. I am an immigration attorney at Heinz Law, PLLC, in St. Paul, Minnesota. My practice focuses on removal defense in both detained and non-detained context. I represent A.A.R.P. in his immigration proceedings.
2. A.A.R.P. is currently detained at the Immigration and Customs Enforcement (“ICE”) Bluebonnet Detention Facility in Anson, TX, which is owned by Jones County, TX, and operated by MTC.
3. A.A.R.P. is a citizen of Venezuela who was born in 1987. He made an appointment to present at a port of entry using the CBP One app and presented with his wife and their son at the Paso Del Norte Port of Entry in El Paso, Texas in August 2023.
4. When A.A.R.P. was at Paso Del Norte, CBP officers asked him about his tattoos and whether he had any connection to a gang. A.A.R.P. denied any connection to a gang and explained that all his tattoos he had for personal reasons. A.A.R.P. and his family were released into the United States. They moved to Minnesota.
5. A.A.R.P. and his wife were leaving their home on March 26, 2025 to carpool to work when they noticed officers looking at the names on mailboxes in their apartment complex. ICE officers then followed them and stopped their car and arrested A.A.R.P.
6. In an I-213, ICE has accused A.A.R.P. of having “tattoos and associates that indicate membership in the Tren de Aragua gang.” That statement is the only evidence provided by ICE for its allegation. A.A.R.P. strongly denies any connection to Tren de Aragua.
7. A.A.R.P. has a number of tattoos for personal reasons, including various decorative and religious tattoos, such as a cross and the Virgin Mary. CBP officers asked him specifically about a clock tattoo on his forearm—that clock appears under a tattoo of his son’s face and shows the date and time of his son’s birth. Because A.A.R.P.’s wife had had several miscarriages when they were trying to conceive, their son’s birth was particularly important to A.A.R.P. to commemorate in a tattoo. None of his tattoos are related to Tren de Aragua.

8. Following his arrest by ICE, A.A.R.P. had been detained at the Sherburne County Jail in Minnesota. A.A.R.P. is in pending immigration removal proceedings. A.A.R.P. fears returning to Venezuela and has sought asylum, withholding of removal, and protection under the Convention Against Torture. A.A.R.P. and his family were persecuted in the past for their political beliefs and for publicly protesting against the current Venezuelan government. A.A.R.P. fears further political persecution if removed to Venezuela. He is scheduled for an immigration hearing on April 28, 2025 with the Fort Snelling, Minnesota Immigration Court. Early on April 14, 2025, he was transferred to Bluebonnet despite his upcoming hearing in Minnesota.
9. I am unaware of any criminal history for A.A.R.P. in the United States and A.A.R.P. denies that he has any criminal history here. I am unaware of any criminal history in Venezuela and A.A.R.P. denies that he has any criminal history there. The I-213 filed by ICE on April 2, 2025 states that A.A.R.P. has no known criminal record.
10. I am aware from news reports that on March 15, 2025, ICE transferred a group of Venezuelan men and flew them to the Terrorism Confinement Center (“CECOT”) in El Salvador. Based on knowledge and belief, there were people in that group who were similarly situated to A.A.R.P. It appears to me that A.A.R.P. is at grave risk of ICE alleging that he is removable under the Alien Enemies Act as a member of Tren de Aragua.

I, Victoria Blakeborough, swear under penalty of perjury that the forgoing declaration is true and correct to the best of my knowledge and recollection.

/s/ Victoria Blakeborough

Executed this 15th day of April, 2025